



## MEMORANDUM

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**DATE:** October 6, 1997  
**TO:** Loren Bottorff  
**FROM:** Bill Brownlie  
**RE:** Review of CALFED Technical Reports, Third Edition

We have reviewed most of the third editions of the CALFED technical reports. A list of the reports and their review status is attached. We have not yet received a copy of the following reports:

- Flood Control Economics
- Regional Economics (Affected Environment)
- Surface Water Hydrology (Impacts/Consequences)

Of the reports we have received, we have not yet reviewed the following:

- Surface Water Supply and Water Management
- Utilities and Public Services

The latter two reports were received late last week, however we are continuing our review and will prepare comments as soon as possible.

### CONTENT OF THE REVIEW PACKAGE

The review package consists of:

- a set of general comments and recommendations based on our general observations during the review task (below, in this memo);
- a set of copies of the reports containing our editorial comments and margin notes focusing on identifying unnecessary and irrelevant material and reorganization;
- a set of summary comments regarding major observations on each report;
- a list of items not in conformance with the standard outlines (technical reports were also spot-checked for consistency with the Calfed format style guide); and
- a table containing general and specific comments and suggestions addressed to the technical report writers to aid in finalizing the reports.

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The reports were reviewed for consistency with the applicable organization outlines (June 25, 1997 for Environmental Impacts and April 18, 1997 for Affected Environment). Where alternate organizational schemes were employed by the technical teams, those organization schemes were assessed in some degree to evaluate their effectiveness in presenting the material. Obviously there are advantages to sticking with a consistent format for all of the reports. In most cases the format was not strictly adhered to. Most of the technical report writers took the initiative to make obvious corrections or to add to the outlines. We considered these to be appropriate modifications that do not change the overall standardization of the reports. In most cases in which more substantial organizational changes were made the technical report writers could have adapted to the standard format without much difficulty. In a few cases, the nature of the material did not fit easily within the standard format. The primary motivations for choosing an alternate format in our opinion would be to avoid repetition or to present the material more effectively. Noise, air quality, socio-economics, and groundwater are examples of resource categories in which the material is not neatly divisible into the five standard regional divisions.

If CalFed determines that these reports should be used as formal references for the EIR/EIS (and finalized as 'open file' reports), it may be sufficient, in some cases, to ensure that the information contained in the reports is complete and presented in a coherent manner rather than to require that all of the reports adhere strictly to the outline.

Our review was focused on:

- technical completeness
- full identification of all issues required to be addressed in the EIR/EIS
- clear delineation of setting and impact information
- editorial suggestions to focus the technical reports
- editorial suggestions to assist in converting portions of the technical reports to EIR/EIS sections
- applicability of criteria of significance to CEQA and NEPA requirements
- applicability of identified mitigations to identified impacts
- assuring that mitigation measures are feasible, implementable, and enforceable.

Our review found that:

1. reports vary substantially in terms of comprehensiveness and technical completeness. This may be a result of:
  - lack of refinement/definition of the program elements (which affects various resource topics to different degrees), or
  - an inconsistent understanding of, and approach to, programmatic EIR/EIS analysis amount the report writers
2. many of the reports include substantial information which can be edited down to form the bases of Draft EIR/EIS sections (see mark-ups)
3. most of the mitigation measures identified in the reports are not sufficiently described so as to be feasible, implementable, and enforceable

4. criteria of significance are inconsistent - report writers should refer to CEQA Guidelines Appendix G and initial Study checklist form for guidance on significance criteria. It is recognized that NEPA and CEQA differ in their requirements for addressing significance, however, because the Calfed document is to be a joint EIR/EIS, the more restrictive provisions of both laws must be met, and thresholds of significance should be clearly identified.
5. the use of the concept of 'mitigation strategies' has sometimes been interpreted to mean that mitigations may be extremely general and not well-tailored to addressing specific program impacts. To some degree, this may be a function of the degree of refinement of the program at this stage, however in many reports mitigations should be more precise and should be directly linked to specific impacts identified in the reports.
6. the post-mitigation significance of impacts should be addressed, as well as any secondary effects of implementing the identified mitigation measures.
7. while the use of the five regions is an effective organizational tool for the alternatives, in some cases (e.g. air quality) it may not correspond to the physical regions of potential impact and therefore may misdirect the focus of certain analyses. Some of the report writers have focused on the resource areas while others have focused on the five regions. This has introduced substantial inconsistencies between technical reports, both in terms of focus and organization. If not rectified, this problem will affect the preparation of the PEIR/EIS. This can be addressed by allowing some flexibility in organization for those reports already completed.
8. certain technical analyses rely on data or conclusions from other technical reports and, due to scheduling issues, there has not been adequate opportunity for the technical analysts to share conclusions and incorporate them into the appropriate reports. For example, flow information needed in the fisheries and aquatic resources analysis is, or could be, presented in the hydrodynamics and riverine hydraulics report. Similarly, the regional economics report should consist of a second tier analysis of data presented in the individual economic sector technical reports.
9. the scopes of certain technical reports show substantial overlap and could include conflicting information or level of detail of analysis. These include the various economic reports; the hydrology-related reports; the geomorphology, flood control system, and groundwater reports; and the groundwater and water quality reports. The various authors of the overlapping technical reports should review relevant factual data and revise their reports for consistency. Alternately, Calfed should assign a lead reviewer/preparer for certain broad topics (i.e. economics and socioeconomics) to assure consistency.
10. Calfed should consider eliminating the summaries from the technical reports. In general, the existing summaries fail to meet the needs of the PEIS. In part this is probably due to misunderstanding of the purpose of the summaries on the part of the technical report preparers. It also may have been due to lack of a detailed outline for the summaries. If the concept of the summaries is retained, the technical report writers should receive a thorough briefing on the requirements of the PEIS, including relevant portions of the detailed outline of the PEIS, and a sample write-up. A strategy for preparing summaries of overlapping reports should be devised (assigning a lead preparer to organize and edit material from several reports).

11. Although the 6/25/97 outline calls for describing the impacts of the common programs in each region *for alternatives 1, 2, and 3*, this leads to unnecessary repetition. The impacts of the common programs are generally independent of the conveyance and storage options and could be described once for each region. Any remaining differences between the alternatives due to effects of the common programs could be discussed under the alternative.
12. Question and answer meetings should be held with the technical report writers to discuss the requirements and strategies for finalizing the technical reports. The teams preparing reports that rely on data developed by other teams should be convened to resolve their data requirements.

In addition to these general comments, we have provided specific suggestions, in the form of written comments, for completing the various technical reports. These are intended as a preliminary peer review to provide assistance to the technical report writers in completing their analyses. Due to time constraints, some of these reviews are more comprehensive than others. The report writers are encouraged to use their discretion and professional expertise in addressing and implementing these recommendations. We would be pleased to discuss or clarify any of these comments.